

Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

DEC 26 1998

In the Matter of

Amendment of Section 73.202(b),  
Table of Allotments,  
FM Broadcast Stations.  
(Topeka, Iola and Emporia, Kansas)

MM Docket No. 98-13  
RM-9212

TO: Chief, Allocations Branch

**COMMENTS OF INNOVATIVE BROADCASTING CORPORATION**

Innovative Broadcasting Corporation ("Innovative") hereby submits the following comments in support of the rule changes proposed in this proceeding:

1. By Notice of Proposed Rule Making and Order to Show Cause, released February 6, 1998, the Chief, Allocations Branch, proposes *inter alia* to modify the license of Station KIKS, Iola, Kansas, to change the operating frequency of Station KIKS from Channel 257A to Channel 268A.

2. Innovative is the licensee of FM Broadcast Station KSEK, Girard, Kansas. Station KSEK currently operates on Channel 256A as a 3 kW facility. However, the licensee of Station KSEK has commissioned the engineering firm of E. Harold Munn, Jr. & Associates to make a study looking towards an increase in the facilities of Station KSEK to 6 kW. That study shows that at the present time the increase to 6 kW is not feasible, because of an adjacent channel conflict with Station KIKS in Iola, Kansas.

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3. To the extent that the petition in this proceeding contemplates that Station KIKS will change operating frequency from Channel 257A to Channel 268A, the proposed rule changes will benefit both Innovative and the public interest. With KIKS moved to a different channel, Station KSEK will be enabled to increase power to 6 kW, thereby enlarging the area and populations which it serves in the public interest. See attached Figure 1. Thus, in addition to accommodating the upgrade requested by the petition, the proposed rule changes will also make it possible for Station KSEK to make a more efficient use of the broadcast spectrum.

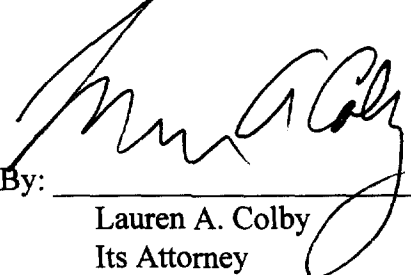
WHEREFORE, Innovative respectfully supports the rule changes contemplated in this proceeding.

Respectfully submitted,

March 25, 1998

INNOVATIVE BROADCASTING CORPORATION

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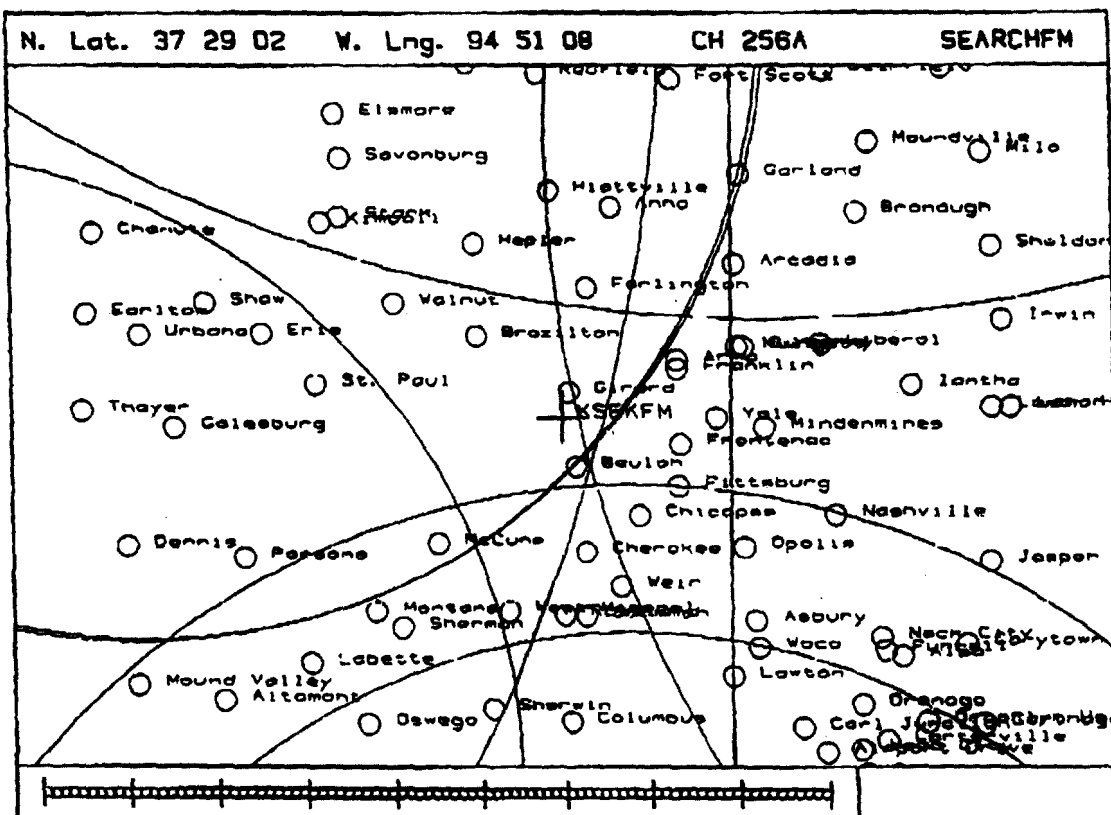


FIGURE 1  
Licensed KSEK-FM Facilities - Girard, KS

Call	CH#	Location		D-KM	Azi	FCC	Margin
KSEKFM	256A	Girard	KS	0.00	0.0	115.0	-115.00
KIKSFM	257A	Iola	KS	66.99	314.0	72.0	-5.01
DE257	257A	Iola	KS	66.99	314.0	72.0	-5.01
KTLL	256C1	El Dorado	KS	195.07	285.7	200.0	-4.93
KIKSFM	257A	Iola	KS	67.26	313.4	72.0	-4.74
KY00FM	256C3	Half Way	MO	143.76	77.1	142.0	1.76
KGVE. A	257C3	Grove	OK	96.89	175.4	89.0	7.89
ALOPEN	257C3	Grove	OK	96.89	175.4	89.0	7.89
KQRCFM	255C	Leavenworth	KS	177.69	7.5	165.0	12.69
KUSN	255A	Coffeyville	KS	87.75	241.8	72.0	15.75
KGVE	257A	Grove	OK	96.89	175.4	72.0	24.89

### **CERTIFICATE OF SERVICE**

I, Traci Maust, a secretary in the law office of Lauren A. Colby, do hereby certify that copies of the foregoing have been sent via first class, U.S. mail, postage prepaid, this 25<sup>th</sup> day of March, 1998, to the offices of the following:

Iola Broadcasting, Inc.  
P.O. Box 710  
Iola, KS 66749

C&C Consulting, Inc.  
713 East Clark  
Emporia, KS 41541

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Traci Maust